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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

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In Re:	)	
	)	
Rebuiltcars Corporation,	)	NO. 17-11811
Debtor	)	
	)	Chapter 11
	)	
	)	Honorable Judge Timothy A. Barnes

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**NOTICE OF MOTION**

TO: See Attached Certificate of Service

PLEASE TAKE NOTICE that on December 4, 2018, at 10:00 AM, the undersigned will appear before the Honorable Timothy A. Barnes at the Dirksen Federal Building, located at 219 S. Dearborn, Courtroom 744, Chicago, Illinois and will then and there present the attached **MOTION FOR ENTRY OF FINAL DECREE**, at which time you may appear if you so choose.

**BY: S/PENELOPE B. BACH**  
**BACH LAW OFFICES**  
**COUNSEL FOR DEBTOR(S)**  
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NORTHBROOK, IL 60062  
PHONE: (847) 564 0808  
ATTORNEY No: 6284659

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**MOTION FOR ENTRY OF FINAL DECREE**

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NOW COMES the Reorganized Debtor, Rebuiltcars Corporation, by its attorneys, Penelope N. Bach and Paul M. Bach of Bach Law Offices, and ask this Honorable Court to enter a Final Decree, as well as closing this case with a reservation of jurisdiction to reopen this case for any of the reasons stated in the confirmed Chapter 11 Plan and/or Disclosure Statement. In support thereof, the Reorganized Debtor states as follows:

1. On April 14, 2017, the Debtor filed a Voluntary Petition for Relief, according to the provisions of Chapter 11 of the Code.
2. On October 9, 2018, this Court held a hearing and entered an Order pursuant to Section 1129 of the bankruptcy Code confirming the Debtor's Plan of Reorganization.
3. The plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code. (See attached Proof of Payments).
4. Debtor requests that this Court enter a final decree closing this Chapter 11 case. The final decree should expressly reserve jurisdiction in this Court for all pending matters, all final fee hearings, and those matters enumerated in Article VI of the Plan.

WHEREFORE, the Reorganized Debtor, Rebuiltcars Corporation, asks this Honorable Court to enter a Final Decree closing this Chapter 11 case with an express reservation of jurisdiction as requested in this Motion, and for such other relief as is just and equitable.

Respectively Submitted,  
Rebuiltcars Corporation

By: /s/ Penelope N. Bach

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